

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

BABY DOE, <i>et al.</i>)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	Case No. 3:22-cv-49-NKM
)	
JOSHUA MAST, <i>et al.</i>)	
)	
<i>Defendants,</i>)	
)	
and)	
)	
UNITED STATES SECRETARY OF)	
STATE ANTONY BLINKEN, <i>et al.</i> ,)	
)	
<i>Nominal Defendants.</i>)	
_____)	

**DEFENDANTS JOSHUA AND STEPHANIE MAST’S SECOND INTERROGATORIES
TO PLAINTIFFS JANE AND JOHN DOE**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, and the applicable Local Rules of the Western District of Virginia, Defendants Joshua and Stephanie Mast, by counsel, submit the following Interrogatories to Plaintiffs Jane and John Doe. Plaintiffs’ responses are due as required by the Federal Rules of Civil Procedure.

DEFINITIONS AND INSTRUCTIONS

1. The “Action” means the above-captioned action.
2. The phrases “You,” “Your,” and “Plaintiffs” each mean or refer to the persons identified in the Complaint as Jane and John Doe, as well as their agents and attorneys, and any other Person acting on their behalf.
3. “Complaint” means the Amended Complaint filed by Plaintiffs in this Action on

October 28, 2022.

4. “Person” means the plural, as well as the singular, and includes natural persons, corporations, public corporations, governments, governmental agencies, partnerships, groups, firms, associations, or other organizations or entities of any description.

5. A request to “identify” or its derivatives (*i.e.*, “identity”), when used in reference to a natural person, shall be interpreted as a request to state in the answer in each instance:

- a. The person’s full name and present or last known business and home address, and telephone number, and
- b. The person’s occupation or business (including the name and address of the person's present employer) and position.

6. The term “identify,” when used with respect to any document or tangible thing, shall mean to Identify its location, its owner, and, if it is a document, to Identify the author, recipient, date, and bates number.

7. When asked to “describe” with particularity or “explain in detail” or “describe in detail” an act, occurrence, event, transaction or communication, the description or explanation should include, but is not limited to, the following:

- a. The date, time, and place;
- b. The name of each person present, whether or not a participant;
- c. The nature, substance and subject matter with sufficient specificity to identify relevant aspects; and
- d. The explanation of description should reference underlying facts rather than ultimate facts or conclusions of fact or law.

8. Your response to each discovery request is to include the identification of all information and documents available to you, including information and documents within the actual or constructive possession of Your attorneys, investigators or other agents.

9. For purposes of these Interrogatories, the word “and” includes the disjunctive “or” and the word “or” includes the conjunctive “and.” Words in the singular shall be interpreted to include both the singular and the plural. A masculine, feminine, or neuter form of a word shall be interpreted to include the other genders. The use of any tense of any verb shall be interpreted to include all other tenses.

10. If You assert that a privilege limits Your obligation to provide a response to any Interrogatory, including, but not limited to, those requesting descriptions of document(s), Your objection should set forth: (1) the nature of the privilege asserted (*i.e.*, attorney-client, etc.); (2) a sufficient description of the facts upon which You base Your objection to apprise the Court of Your entitlement to the claim; (3) the date and place of any document’s creation along with the document’s drafter, the identity of any intended recipients, and a brief description of its substantive contents.

INTERROGATORIES

9. Describe in detail every basis the risk of harm to persons in Afghanistan that would result or is resulting from identification of Baby Doe or the disclosure of information relating to Baby Doe and a connection with You or Defendants, including the identity of each person who faces such risk of harm.

10. Identify each relative of John Doe, Jane Doe, or Baby Doe in Afghanistan, and for each relative, describe their relationship to John Doe, Jane Doe, and Baby Doe.

11. Describe in detail any financial support John or Jane Doe have received to support this proceeding or the state court proceedings related to Baby Doe, including the source of payment for any attorneys’ fees.

12. Identify each person to whom You have sent, shared, or otherwise provided a photograph of Baby Doe since John and Jane Doe arrived in the United States.

Dated: August 10, 2023

Respectfully submitted,

/s/ Michael Francisco

Michael L. Francisco (*pro hac vice*)

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